

Guide for Review of Overall Management Systems			
Participating Jurisdiction (PJ):			
Staff Consulted:			
Name(s) of Reviewer(s)		Date	

NOTE: All questions that address requirements contain the citation for the source of the requirement (statute, regulation, NOFA, or grant agreement). If the requirement is not met, HUD must make a finding of noncompliance. All other questions (questions that do not contain the citation for the requirement) do not address requirements, but are included to assist the reviewer in understanding the participant's program more fully and/or to identify issues that, if not properly addressed, could result in deficient performance. Negative conclusions to these questions may result in a "concern" being raised, but not a "**finding**."

Instructions: This Exhibit is designed to assess the overall administration of the PJ's HOME Program. It is divided into nine sections: Overall Management; Program Progress, Reporting and Oversight; Written Agreements; HOME Subsidy; HOME Affordability Requirements; Housing Quality Standards; Other Requirements; Recordkeeping; and Financial Management. The Exhibit may also be used as an interview instrument for program staff.

Questions:

A. OVERALL MANAGEMENT

1.

Are the duties and responsibilities of PJ staff clearly defined and understood by both management and staff?	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
Describe Basis for Conclusion:		

2.

Are lines of authority clearly outlined and understood by both management and staff?	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
Describe Basis for Conclusion:		

3.

Are there systems in place that establish deadlines and track employee performance of specific tasks?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Describe Basis for Conclusion:		

4.

Are there systems to ensure that staff receives the appropriate information to enable them to complete tasks timely?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Describe Basis for Conclusion:		

5.

Does the program staff maintain a library of HOME written guidance (final rule and policy notices) or access to those documents on-line as needed?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Describe Basis for Conclusion:		

B. PROGRAM PROGRESS, REPORTING AND OVERSIGHT

6.

Based on the Integrated Disbursements and Information System (IDIS) Report PR 27 and commitment reports, is the PJ making sufficient progress in committing funds to meet the 24-month deadline [e.g., the PJ met its deadline in the past three months or, if the PJ continues to commit funds at its current monthly or quarterly commitment rate, it will meet its next deadline as established at 24 CFR 92.500(d)(1)(B)]?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Describe Basis for Conclusion:		

7.

Based on the IDIS report PR 27 and Community Housing and Development Organization (CHDO) reservation reports, is the PJ making sufficient progress in reserving funds to CHDOs within the 24-month deadline [e.g., the PJ met its deadline in the past 3 months or, if the PJ continues to reserve funds at its current monthly or quarterly reservation rate, it will meet its next deadline as established at 24 CFR 92.500(d)(1)(A)]?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion: 	

8.

Does the current rate of spending indicate that project funds will be spent by the 5-year expiration date [e.g., based upon its current monthly, quarterly expenditure rates as established at 24 CFR 92.500(d)(1)(C)]?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion: 	

9.

Based on the IDIS Report PR 22, are projects progressing timely (e.g., no open projects more than 6 months old with no draws, no projects with funds partially drawn down with no activity for more than 6 months)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion: 	

10.

Based on the IDIS Report PR 22, is the PJ entering required data in IDIS timely (e.g., PJ completing projects in IDIS and entering beneficiary data within 120 days of final draw)? [24 CFR 92.502(d)(1)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Describe Basis for Conclusion:		

11.

Does the PJ have a system for tracking the progress of projects from commitment to completion and occupancy?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Describe Basis for Conclusion:		

12.

Does the PJ review the performance of program participants (i.e., subrecipients, state recipients, and contractors) at least annually? [24 CFR 92.504(a)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Describe Basis for Conclusion:		

13.

Does the PJ select program participants for on-site monitoring at regular intervals or on the basis of risk assessment results?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Describe Basis for Conclusion:		

14.

Does the PJ review the progress of funded entities to ensure that project commitments result in disbursements and, ultimately, completed projects? [24 CFR 92.504(a)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Describe Basis for Conclusion:		

15.

If funded entities are not making adequate progress, does the PJ take action to correct the lack of progress (e.g., deobligating and reprogramming funds, provision of technical assistance, etc.)? [24 CFR 92.504(a)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Describe Basis for Conclusion:			

C. WRITTEN AGREEMENTS

16.

a. Does the PJ execute written agreements with HOME recipients (e.g., homeowners, homebuyers, rental owners, subrecipients, contractors, CHDOs) before committing or disbursing funds? [24 CFR 92.504(b)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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Describe Basis for Conclusion:

b. Do the written agreements include all required provisions? [24 CFR 92.504(c)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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Describe Basis for Conclusion:

c. Are written agreements effective for the performance period (subrecipients, state recipients, and contractors) or affordability period (homebuyers and rental project owners)? [24 CFR 92.504(c)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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Describe Basis for Conclusion:

D. HOME SUBSIDY

17.

Does the PJ have procedures to ensure that it complies with the minimum HOME investment requirement of 24 CFR 92.205(c)?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Describe Basis for Conclusion: 		

18.

Does the PJ have procedures to ensure it complies with the maximum HOME investment limit requirement of 24 CFR 92.250(a)?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Describe Basis for Conclusion: 		

19.

Has the PJ adopted and implemented subsidy layering procedures for examining projects that receive HOME and other public subsidies? [24 CFR 92.250(b)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Describe Basis for Conclusion: 			

20.

Does the PJ have systems to ensure that all costs paid with HOME funds are eligible? [24 CFR 92.206 – 209]	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Describe Basis for Conclusion:		

21.

Does the PJ have systems to ensure that all costs paid with HOME funds are reasonable? [24 CFR 85.20(b)(5)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Describe Basis for Conclusion:		

22.

a. Is HOME assistance provided only in eligible forms (e.g., equity investments, interest bearing and non-interest bearing loans and advances, interest subsidies, deferred payment loans or grants)? [24 CFR 92.205(b)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Describe Basis for Conclusion:		

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b. If a form of assistance not listed above is used, has it been submitted to and approved by HUD? [24 CFR 92.205(b)(1)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Describe Basis for Conclusion:			

E. HOME AFFORDABILITY REQUIREMENTS

23.

Is the PJ using the current HOME income limits issued by HUD? [24 CFR 92.252(a) and 92.254(a)(3)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Describe Basis for Conclusion:		

24.

Does the PJ have procedures for ensuring that income determinations meet HOME requirements established in 24 CFR 92.203?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Describe Basis for Conclusion:		

25.

Does the PJ use adopt a single income definition for each program that it administers?	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
Describe Basis for Conclusion:		

26.

If the PJ is undertaking rental activities, is it using the current rent limits? [24 CFR 92.252(a) and (b)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
Describe Basis for Conclusion:			

27.

Does the PJ have systems to ensure that rental project owners receive current income and rent limits pursuant to 24 CFR 92.252(f)(2)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
Describe Basis for Conclusion:			

28.

If it undertakes homebuyer assistance, has it established resale or recapture provisions that meet the requirements of 24 CFR 92.254(a)(5)(i) or (ii)? [24 CFR 92.254(a)(5)(i) or (ii)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Describe Basis for Conclusion:			

F. HOUSING QUALITY STANDARDS

29.

Does the PJ have procedures to ensure that all HOME-assisted units meet applicable property standards at completion and, if applicable, throughout the period of affordability pursuant to 24 CFR 92.251?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Describe Basis for Conclusion:		

30

Has the PJ adopted written rehabilitation standards for its rehabilitation programs? [24 CFR 92.251(a)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Describe Basis for Conclusion:			

31

Has the PJ identified property standards and codes applicable to HOME-assisted projects? [24 CFR 92.251]	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Describe Basis for Conclusion:		

32.

Does the PJ have a construction management system that ensures that work is completed and performed in accordance with rehabilitation or construction methods and materials standards, building codes, etc., specified in the construction contract? (Note: Lack of documentation demonstrating that initial, progress, and final inspections are performed; no work write-ups or extremely general write-ups; frequent citizen complaints; apparent use of poor quality materials; recurrent housing problems; or difficulty maintaining properties in standard condition are all possible indicators of problems in this area.) [24 CFR 92.505(a) and 24 CFR 85.36(b)(2)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
Describe Basis for Conclusion:			

33.

Does the PJ have a system to ensure that projects meet the accessibility standards of Section 504, as applicable, pursuant to 24 CFR 92.251(a)(3)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
Describe Basis for Conclusion:			

G. OTHER REQUIREMENTS

34.

Does the PJ have procedures to ensure that the following requirements, if applicable, are incorporated into its programs and projects:			
a. Affirmative Marketing pursuant to 24 CFR 92.351?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
b. Environmental Review pursuant to 24 CFR 92.352? (This determination may be based upon the use of appropriate Exhibits in Chapter 21; on the projects sampled; or by use of staff interviews and other verification methods.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
c. Relocation pursuant to 24 CFR 92.353?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
d. Labor Standards pursuant to 24 CFR 92.354?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A

e. Lead hazard reduction pursuant to 24 CFR 92.355? (This determination may be based upon use of the Exhibits in Chapter 24; projects sampled; or staff interviews and other verification methods.)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Describe Basis for Conclusion:			

H. RECORDKEEPING

35.

Does the PJ maintain records to demonstrate compliance with HOME requirements? [24 CFR 92.508]	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Describe Basis for Conclusion:		

36.

Are records retained for the time periods specified in the HOME final rule? [24 CFR 92.508(c)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Describe Basis for Conclusion:		

I. FINANCIAL MANAGEMENT

37.

Does the PJ disburse funds within 15 days of draw? [24 CFR 92.502(c)(2)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Describe Basis for Conclusion:		

38.

If any interest in excess of \$100 was earned on funds not expended for eligible costs within 15 days of drawdown, has it been returned to the U.S. Treasury at least quarterly? [24 CFR 92.502(c)(2)]	<table> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> <td>N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					
Describe Basis for Conclusion: 							

39.

Do financial records identify the source and application of funds for each fiscal year? [24 CFR 92.508(a)(5)(i)]	<table> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No
<input type="checkbox"/>	<input type="checkbox"/>				
Yes	No				
Describe Basis for Conclusion: 					

40.

Does the PJ maintain records regarding the Federal and local HOME Investment Trust Fund accounts, including deposits, disbursements, balances, and supporting documentation? [24 CFR 92.508(a)(5)(ii)]	<table> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No
<input type="checkbox"/>	<input type="checkbox"/>				
Yes	No				
Describe Basis for Conclusion: 					

41.

Does the PJ maintain records regarding the source and application of program income, repayments, and recaptured funds? [24 CFR 92.508(a)(5)(iii)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Describe Basis for Conclusion:		

42.

Does the PJ maintain records that demonstrate adequate budget controls in compliance with 24 CFR 85.20, including evidence of periodic account reconciliation? [24 CFR 92.508(a)(5)(iv)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Describe Basis for Conclusion:		

43.

Describe the procedures that the PJ uses to ensure that information entered into IDIS is accurate.
Describe Basis for Conclusion: